

Message

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**From:** O'Neill, Sandra [ONeill.Sandra@epa.gov]  
**Sent:** 5/6/2021 2:56:31 PM  
**To:** Dawson, Jeffrey [Dawson.Jeff@epa.gov]  
**Subject:** RE: Biomist Adulticide

Got it, will include them as well.

Thanks, Jeff

*Sandra O'Neill*  
919 323 7926

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**From:** Dawson, Jeffrey <Dawson.Jeff@epa.gov>  
**Sent:** Thursday, May 6, 2021 10:49 AM  
**To:** O'Neill, Sandra <ONeill.Sandra@epa.gov>  
**Subject:** RE: Biomist Adulticide

Sandra

No worries. I think David and Dan would be good to invite.

Thx

Jeff

Jeffrey L Dawson  
Senior Science Advisor  
Immediate Office  
U.S. EPA, Office of Chemical Safety and Pollution Prevention  
1200 Pennsylvania Ave NW (7101M)  
Washington, DC. 20004  
703-305-7329  
Email: [dawson.jeff@epa.gov](mailto:dawson.jeff@epa.gov)  
Deliveries: 1201 Constitution Ave NW, Washington, DC 20004

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**From:** O'Neill, Sandra <[ONeill.Sandra@epa.gov](mailto:ONeill.Sandra@epa.gov)>  
**Sent:** Thursday, May 06, 2021 9:58 AM  
**To:** Dawson, Jeffrey <[Dawson.Jeff@epa.gov](mailto:Dawson.Jeff@epa.gov)>  
**Subject:** RE: Biomist Adulticide

Hi Jeff, sorry for the oversight of not including you in the list of who would participate, I intended to communicate those folks are in addition to you, the central figure!

Regarding OPPT folks, should I still add Dave Widawsky and Dan Helfgott?

FYI - I'm emailing Maryland Dept. of Ag and Maryland Dept. of Environment folks this AM to establish a 30 minute timeframe the week of the 17<sup>th</sup> (no availability next week with the list of HQ and R3 attendees).

Thanks,

Sandra O'Neill  
919 323 7926

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**From:** Dawson, Jeffrey <[Dawson.Jeff@epa.gov](mailto:Dawson.Jeff@epa.gov)>  
**Sent:** Wednesday, May 5, 2021 1:35 PM  
**To:** O'Neill, Sandra <[ONeill.Sandra@epa.gov](mailto:ONeill.Sandra@epa.gov)>  
**Subject:** RE: Biomist Adulticide

Sandra,

Thanks for the info. Could you include me on the invite as well?

Thanks

Jeff

Jeffrey L Dawson  
Senior Science Advisor  
Immediate Office  
U.S. EPA, Office of Chemical Safety and Pollution Prevention  
1200 Pennsylvania Ave NW (7101M)  
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703-305-7329  
Email: [dawson.jeff@epa.gov](mailto:dawson.jeff@epa.gov)  
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**From:** O'Neill, Sandra <[ONeill.Sandra@epa.gov](mailto:ONeill.Sandra@epa.gov)>  
**Sent:** Wednesday, May 05, 2021 12:35 PM  
**To:** Dawson, Jeffrey <[Dawson.Jeff@epa.gov](mailto:Dawson.Jeff@epa.gov)>  
**Cc:** Garcia, Beth <[garcia.beth@epa.gov](mailto:garcia.beth@epa.gov)>; Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>; Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>  
**Subject:** RE: Biomist Adulticide

Hi Jeff, Marietta, Kimberly, and Beth,

Beth and I just had a call and I learned Region 3 has had two calls with Maryland. One was a more executive level call on March 26 with Paul Leonard, R3 Acting Deputy Regional Administrator, Ed, and the Maryland Department of Environment (MDE). A second call, smaller call, took place with Rick and the Maryland Department of Environment on April 28<sup>th</sup> – this is when Rick first heard that MDE would be using Biomist instead of Permanone for spraying. For this follow-up call, it seems appropriate to expand the call to the executive level, including R3 Regional DDs, as well as the R3 staff who work with MDE so they're aware of the conversation.

On the EPA side, I think it'd be Marietta, Jennifer/Jackie (and any others), Kimberly, Thuy/Yaorong and perhaps asking Ed/Rick if they'd like to join. If this sounds ok, we can move forward with identifying dates/times. Do we think the call would be 30 min. or 1 hour?

Thanks,

Sandra O'Neill  
919 323 7926

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**From:** Dawson, Jeffrey <[Dawson.Jeff@epa.gov](mailto:Dawson.Jeff@epa.gov)>  
**Sent:** Wednesday, May 5, 2021 7:31 AM  
**To:** O'Neill, Sandra <[O'Neill.Sandra@epa.gov](mailto:O'Neill.Sandra@epa.gov)>  
**Subject:** RE: Biomist Adulticide

Sandra,

Here are the topics I ran by Rick for the agenda.

- Status of the product packaging issue
- Maryland's operational needs for beginning applications, product availability, etc.
- General check in on the PFAS topic

As far as invitees I think RD (Marietta and whoever she thinks such as Jen S). Also, someone from BEAD (probably Kimberly or Neal) then whoever else you think.

I really don't have much of the details on the Maryland issue. Can you send me any details?

Thanks

Jeff

Jeffrey L Dawson  
Senior Science Advisor  
Immediate Office  
U.S. EPA, Office of Chemical Safety and Pollution Prevention  
1200 Pennsylvania Ave NW (7101M)  
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703-305-7329  
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**From:** O'Neill, Sandra <[O'Neill.Sandra@epa.gov](mailto:O'Neill.Sandra@epa.gov)>  
**Sent:** Tuesday, May 04, 2021 7:56 PM  
**To:** Dawson, Jeffrey <[Dawson.Jeff@epa.gov](mailto:Dawson.Jeff@epa.gov)>  
**Subject:** RE: Biomist Adulticide

Hi Jeff,

I may not have been present for the last meeting with Maryland, but sounds like the agenda topics might be at a fairly high level. Looping back with you on whether you think we should include some folks from RD – thinking, Marietta, and maybe one of the staff closer to the Biomist processing (Jennifer Saunders and/or Jackie Herrick)?

If you might know when the last call took place, I can also look to that meeting invite for info. on who to include from the Region 3 side.

Thanks and have a nice night,

*Sandra O'Neill*  
919 323 7926

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**From:** Keigwin, Richard <Keigwin.Richard@epa.gov>

**Sent:** Tuesday, May 4, 2021 7:46 PM

**To:** O'Neill, Sandra <O'Neill.Sandra@epa.gov>

**Cc:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>

**Subject:** Re: Biomist Adulticide

Thanks Sandra. The purpose is really meant to be an exchange and update from the previous conversation with our Maryland colleagues. Jeff Dawson has some ideas for an agenda that he can share with the group.

Rick Keigwin

Acting Deputy Assistant Administrator for Management

Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency

Phone: 202-564-2910

Sent from my iPhone (Please excuse typos!)

On May 4, 2021, at 4:54 PM, O'Neill, Sandra <O'Neill.Sandra@epa.gov> wrote:

Hi Rick and all,

I've got Jeff Dawson and maybe Dave Widawsky or Dan Helfgott from OPPT (P2 issues) for names for this meeting. To ensure we have the right folks in the room for this discussion, can we clarify the purpose of the call? For example, would RD folks need to be on hand to answer questions about approving the Biomist container?

Thanks in advance for any info.

*Sandra O'Neill*

919 323 7926

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**From:** O'Neill, Sandra <O'Neill.Sandra@epa.gov>

**Sent:** Monday, May 03, 2021 9:03 AM

**To:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>

**Cc:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Herrick, Jacquelyn <Herrick.Jacquelyn@epa.gov>; Picone, Kaitlin <Picone.Kaitlin@epa.gov>

**Subject:** RE: Biomist Adulticide

Good morning all,

I'll look to calendars to coordinate the R3/MD call. Please let me know who from OCSPP should be on the call and if there are specific contacts in MDOA and MDEP that should be included. Timing wise, should the call be this week or next?

Thanks,

*Sandra O'Neill*

AAPCO/SFIREG Project Officer and EPA Region and State Liaison  
Environmental Protection Agency  
Office of Chemical Safety and Pollution Prevention  
Office of Program Support  
Mission Support Division  
Intergovernmental & Community Relations Branch  
919 323 7926

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**From:** Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>  
**Sent:** Friday, April 30, 2021 4:53 PM  
**To:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>  
**Cc:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>; Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Dawson, Jeffrey <[Dawson.Jeff@epa.gov](mailto:Dawson.Jeff@epa.gov)>; Aubee, Catherine <[Aubee.Catherine@epa.gov](mailto:Aubee.Catherine@epa.gov)>; Ozmen, Shamus <[Ozmen.Shamus@epa.gov](mailto:Ozmen.Shamus@epa.gov)>; Lara, Rhina <[Lara.Rhina@epa.gov](mailto:Lara.Rhina@epa.gov)>; Saunders, Jennifer <[Saunders.Jennifer@epa.gov](mailto:Saunders.Jennifer@epa.gov)>; Herrick, Jacquelyn <[Herrick.Jacquelyn@epa.gov](mailto:Herrick.Jacquelyn@epa.gov)>; O'Neill, Sandra <[ONeill.Sandra@epa.gov](mailto:ONeill.Sandra@epa.gov)>; Picone, Kaitlin <[Picone.Kaitlin@epa.gov](mailto:Picone.Kaitlin@epa.gov)>  
**Subject:** RE: Biomist Adulticide

Looping in Sandra/Kaitlin for reaching out to Region 3 and MD.

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**From:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>  
**Sent:** Friday, April 30, 2021 9:07 AM  
**To:** Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>  
**Cc:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>; Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Dawson, Jeffrey <[Dawson.Jeff@epa.gov](mailto:Dawson.Jeff@epa.gov)>; Aubee, Catherine <[Aubee.Catherine@epa.gov](mailto:Aubee.Catherine@epa.gov)>; Ozmen, Shamus <[Ozmen.Shamus@epa.gov](mailto:Ozmen.Shamus@epa.gov)>; Lara, Rhina <[Lara.Rhina@epa.gov](mailto:Lara.Rhina@epa.gov)>; Saunders, Jennifer <[Saunders.Jennifer@epa.gov](mailto:Saunders.Jennifer@epa.gov)>; Herrick, Jacquelyn <[Herrick.Jacquelyn@epa.gov](mailto:Herrick.Jacquelyn@epa.gov)>  
**Subject:** RE: Biomist Adulticide

Might be helpful for OPP to work with OPS and Region 3 to get a call scheduled. Ideally, the call would be with both Maryland Department of Ag and Maryland Department of the Environment.

Is this the type of approval that would be posted to PPLS at some point?

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**From:** Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>  
**Sent:** Friday, April 30, 2021 7:50 AM  
**To:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>  
**Cc:** Nesci, Kimberly <[Nesci.Kimberly@epa.gov](mailto:Nesci.Kimberly@epa.gov)>; Messina, Edward <[Messina.Edward@epa.gov](mailto:Messina.Edward@epa.gov)>; Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Dawson, Jeffrey <[Dawson.Jeff@epa.gov](mailto:Dawson.Jeff@epa.gov)>; Aubee, Catherine <[Aubee.Catherine@epa.gov](mailto:Aubee.Catherine@epa.gov)>; Ozmen, Shamus <[Ozmen.Shamus@epa.gov](mailto:Ozmen.Shamus@epa.gov)>; Lara, Rhina <[Lara.Rhina@epa.gov](mailto:Lara.Rhina@epa.gov)>; Saunders, Jennifer <[Saunders.Jennifer@epa.gov](mailto:Saunders.Jennifer@epa.gov)>; Herrick, Jacquelyn <[Herrick.Jacquelyn@epa.gov](mailto:Herrick.Jacquelyn@epa.gov)>  
**Subject:** RE: Biomist Adulticide

Yes, we approved the new container type for the Biomist 30+30 ULV (reg. no 8329-42) which is the specific product Clarke said is in question. I am copying Jackie in case you need more information.

Also, let us know if you would like RD to participate in a call with MD.

Thanks,  
Marietta

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**From:** Keigwin, Richard <Keigwin.Richard@epa.gov>  
**Sent:** Thursday, April 29, 2021 7:09 PM  
**To:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>  
**Cc:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Dawson, Jeffrey <Dawson.Jeff@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Lara, Rhina <Lara.Rhina@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>  
**Subject:** Re: Biomist Adulticide

Thanks for sharing this information. Am I reading the email correctly to say that we've reviewed the referenced data in the context of the Biomist products? If the answer is yes, then this could inform how we respond to subsequent inquiries. Am also wondering if we should have a follow-up conversation with Maryland.

Rick Keigwin  
Acting Deputy Assistant Administrator for Management  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
Phone: 202-564-2910  
Sent from my iPhone (Please excuse typos!)

On Apr 29, 2021, at 4:27 PM, Echeverria, Marietta <Echeverria.Marietta@epa.gov> wrote:

See Clarke's response below.

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**From:** Karen Larson <klarson@clarke.com>  
**Sent:** Thursday, April 29, 2021 4:15 PM  
**To:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>  
**Subject:** RE: Biomist Adulticide

Hi Marietta,

Thank you for your call and note. As I explained by phone, we are not aware of any testing that shows PFAS contamination in Biomist adulticides. We have not done any product testing with Biomist, though have confirmed by testing that our new Baritainer® containers and our un-fluorinated HDPE containers do not have the potential to leach PFAS into the product. We've submitted those test reports to RD and recently received approval for the Biomist adulticides.

We have not distributed any product in the fluorinated containers since the start of the year. In late January, Clarke initiated a voluntary Product Exchange Program for all of its products, and have collected product in fluorinated containers from our customers. We are currently refilling these orders with fresh production in steel, non-fluorinated HDPE, and in the new Baritainer® barrier-resin containers.

Best regards,  
Karen



**Karen J. Larson**

Vice President, Product Innovation & Government Affairs

**Office :** 630-671-3123

**Email:** [klarson@clarke.com](mailto:klarson@clarke.com)

675 Sidwell Ct. | St. Charles, IL 60174

[www.clarke.com](http://www.clarke.com)

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**From:** Echeverria, Marietta <[Echeverria.Marietta@epa.gov](mailto:Echeverria.Marietta@epa.gov)>

**Sent:** Thursday, April 29, 2021 2:52 PM

**To:** Karen Larson <[klarson@clarke.com](mailto:klarson@clarke.com)>

**Subject:** Biomist Adulticide

Hi Karen,

Following up on the voice message I left you, we have received an inquiry from PEER and from the Maryland Department of Agriculture regarding potential contamination of the Biomist Adulticide product. Is Clarke aware of any testing that shows PFAS contamination of the product? Is Clarke conducting any testing to ensure that the product does not contain PFAS contamination? Thank you.

Regards,  
Marietta

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Marietta Echeverria, Acting Director  
Registration Division  
Office of Pesticide Programs  
Office of Chemical Safety and Pollution Prevention  
703-305-8578

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